

**DEMOCRATIC PARTY;
REPUBLICAN PARTY;
ADESIJUOLA OGUNJOBI;
MEMBERS OF THE CLASS AND SUBCLASSES
AND THOSE SIMILARLY SITUATED**

[list of counsel continued below]

FILED

NOV 25 2020

**SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA

Case No. 3:20-cv-07811-VC

PLAINTIFFS,

**NOTICE OF MOTION AND
MOTION TO INTERVENE
TOKS BANC CORP ET AL**

V.

**Approximately 69,370 Bitcoin (BTC),
Bitcoin Gold (BTG),
Bitcoin SV (BSV), and Bitcoin Cash (BCH)
seized from 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbh,**

**Date: December 3, 2020
Time: 10:00 a.m.
Judge: Hon. Vince Chhabria**

DEFENDANTS.

MOTION TO INTERVENE AND NOTICE OF MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, on December 3, 2020, at 10:00 a.m., or as soon thereafter as counsel may be heard in the courtroom of Hon. John Doe located at Courtroom 4, 17th Floor, San Francisco Federal Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, the Toks Banc Corp, Toks, 5 World Markets Corporation, World Markets Transfer Agency Corporation, Global Prosperity Corporation, United States of America, People's Republic of China, Organization of the Petroleum Exporting Countries (OPEC), Treasury Department of United States, Federal Reserve Board of United States, Federal Reserve Bank of Richmond, International Olympic Committee, Association of Tennis Professionals, Women's Tennis Professionals, International Tennis Federation, National Football League, National Basketball Association, Major League Baseball, Major League Soccer, Donald J. Trump, President of the United States, Melania Trump, First Lady of the United States, Charles, Prince of Wales, Idris Elba, Actor, Singer, Producer, Sabrina Dhowre Elba, Fashion Model, Dak Prescott, Quarterback Dallas Cowboys, Brian Allen, Offensive Lineman Los Angeles Rams, Madonna Louise Ciccone, Singer, Songwriter, The Cincinnati Insurance Company, Democratic Party, Republican Party, Adesijuola Ogunjobi, Entrepreneur putative Plaintiffs as members of the class and subclasses and all persons and entities similarly situated (collectively "Plaintiffs/Buyers" or "Plaintiff-Intervenors") will and hereby do respectfully move this court to intervene as Plaintiffs as of right pursuant to Federal Rule of Civil Procedure 24(a), or in the alternative, respectfully request leave for permissive intervention pursuant to Federal Rule of Civil Procedure 24(b).

Plaintiffs/Buyers via Toks Banc Corp are entitled to intervention of right because this Motion is timely and without delay or prejudice to any parties because the Plaintiffs/Buyers have legally

protectable interests in their class members' economic interests and legal rights under the submission of \$2.5 billion in cash offer via email and fax to United States Attorney's Office of the Northern District of California to purchase 69,370 Bitcoin (BTC), Bitcoin Gold (BTG), Bitcoin SV (BSV), and Bitcoin Cash (BCH) seized from 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbh, Defendant pursuant to a judicial forfeiture action, as authorized by 18 U.S.C. §§ 981(a)(1)(A), 981(a)(1)(C), 981(b), and 21 U.S.C. § 881(a)(6), involving the seizure of the following property.

The Plaintiffs/Buyers move to intervene base on this Notice of Motion and accompanying Memorandum of Points and Authorities in support and such other matters as may be presented to the court at the time of hearing due to this motion to intervene serves the best interests of the United States and supports judicial power of the United States regarding the current siege United States and global community are under right now due to bogus COVID-19 virus the scammers (World Health Organization, CDC, pharmaceutical companies, etc.) have invented to make trillions across the globe at the expense of global community.

This motion was filed due to urgency, numerous emails and fax sent to United States Attorney's Office for the Northern District of California and requests to such office to transfer the assets to accounts set up with a lender so 3,083 bitcoins can serve as collateral against \$25,000,000 loan already approved and processed and document for such loan was signed on November 15, 2020 with notification to the office of U.S. Attorney NDC to act on such transfer since the fund will be used to free the \$5 trillion¹ credit facility which documents were submitted

¹ Publicly Treasury Department, Federal Reserve Board and Federal Reserve Bank of Richmond have not disavowed the assertion documents submitted to structure \$5 Trillion credit facility against the largest global bond offering exist and legal representation and all other relevant elements will allow access to the credit facility which part of it will pay \$2.5 billion in cash to United States Attorney's Office NDC around December 2020. Also website at www.toksbanorporpetal.com established the credit facility inside Global Press Release to the public and by now the Treasury & Federal Reserve would have denounced such information on the website as false.

to United States Attorney's office NDC and use the fund to start the process to prosecute the pending global class action filed to in the United States District Court Eastern District of Virginia Richmond Division (3:20-CV-393) and before United States Court of Appeals For the Fourth Circuit to remand for full scale of trail (20-1688). Username and Password of the account at BlockFi were submitted to seven Assistant United States Attorneys via their emails as follow: Adam Reeves (adam.reeves@usdoj.gov), Josh Eaton (josh.eaton@usdoj.gov), David Countryman (david.countryman@usdoj.gov), Sara Winslow (sara.winslow@usdoj.gov), Hallie Hoffman (Hallie.hoffman@usdoj.gov), Stephanie Hinds (Stephanie.hinds@usdoj.gov) and Claudia Quiroz (claudia.quiroz@usdoj.gov), respectively.

United States has not opposed this offer, nor the Assistant United States Attorneys have the authority to decline the offer and the manner to be paid. The court cannot expect an individual to foot all the bills while at the same time the individuals employed as U.S. attorneys and assistant U.S. attorneys are not required to spend their own money to seize assets and sell such assets for profits to fund the operation of the department of justice. In this case whatever amount United States Attorney's Office NDC prepared to sell the assets for including the \$2.5 billion all cash offer is a significant profit due to not so much resources were utilized to seize those assets, only electric and humans working on computer and those humans are getting paid for their time. Any opposition as of now does not exist, including from the defendant which assets were seized from according to the civil forfeiture lawsuit.

Dated: November 23, 2020

Respectfully submitted,

/S/ Sharon R. Flanagan

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[party to global class action in Virginia]

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Intervenors**

**TOKS BANC CORP;
TOKS;
5 WORLD MARKETS
CORPORATION;**

**WORLD MARKETS TRANSFER
AGENCY CORPORATION;
GLOBAL PROSPERITY
CORPORATION;
UNITED STATES OF
AMERICA;THE PEOPLE'S
REPUBLIC OF CHINA;
ORGANIZATION OF THE
PETROLEUM EXPORTING
COUNTRIES (OPEC);
TREASURY DEPARMENT OF
UNITED STATES;
FEDERAL RESERVE BOARD
OF UNITED STATES;
FEDERAL RESERVE BANK OF
RICHMOND;
INTERNATIONAL OLYMPIC
COMMITTEE;
ASSOCIATION OF TENNIS
PROFESSIONALS;
WOMEN'S TENNIS
PROFESSIONALS;
INTERNATIONAL TENNIS
FEDERATION;
NATIONAL FOOTBALL
LEAGUE;
NATIONAL BASKETBALL
ASSOCIATION;
MAJOR LEAGUE BASEBALL;
MAJOR LEAGUE SOCCER;
DONALD J. TRUMP,
PRESIDENT OF THE UNITED
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MELANIA TRUMP, FIRST
LADY OF THE UNITED
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